



U. S. Department of Housing and Urban Development
Washington, D.C. 20410

OFFICE OF LEAD HAZARD CONTROL

POLICY GUIDANCE NUMBER: 98-01		DATE: January 8, 1998	
SUBJECT:	Modification to 12-month follow-up dust-wipe testing requirement		
STATUS:	Superseded		
APPLICABILITY:	All grant rounds, except grantees participating in the National Evaluation.		
RELATED GUIDANCE:			
COMMENTS:	Superseded by Notice of Funding Availability requirements of Round VI and subsequent NOFAs and grant assistance agreements.		

Dear Lead-Based Paint Hazard Control Grantee:

I am writing to inform you of a modification to the requirement that all units treated and cleared under the Lead-Based Paint Hazard Control Grant Program must undergo follow-up environmental testing twelve months after the hazard control was performed [see applicable Notice of Funding Availability (NOFA) and special condition clause of your HUD grant agreement(s)].

This Office has determined that the information to be provided by the National Evaluation, coupled with the time and costs associated with the follow-up testing requirement no longer justifies its retention as a grant program requirement. However, for those grantees that wish to retain this practice for their own program evaluation purposes, such testing will continue to be an eligible cost under the circumstances outlined below.

Grantees already performing follow-up testing activities on eligible units may continue to do so within the currently approved grant period of performance. However, this Office will no longer grant no-cost extensions to grantees exclusively for the purpose of follow-up testing. Should a grantee opt to continue follow-up testing activities beyond the approved grant period, there are two choices: 1) perform such

testing at the grantee's expense (i.e., using other non-grant related resources) or 2) execute (obligate and drawdown of funds) a contract with a testing firm prior to the end of the grant which will provide for the testing to occur after the grant period of performance has ended. A grantee's ability to utilize this approach is contingent upon compliance with 24 CFR 85.36 (procurement) and 85.37 (subgrants) and whether the procurement and financial management regulations and policies of the grantee jurisdiction allow such a practice.

Grantees that are participating in the National Evaluation must continue to conduct all testing required under that effort. However, grantees not participating in the National Evaluation that choose to discontinue follow-up testing may request to use funds initially dedicated for the 12-month post-hazard control dust-wipe testing activity for other eligible hazard control activities (or be used to obligate a contract with a testing firm prior to the end of the grant which will provide for the testing to occur after the grant has ended). If the grantee's cumulative budget modifications to date, including this request, exceed ten percent of its Federal grant amount, a grant amendment request is required. Grant amendment requests should be submitted to the HUD Grant Officer, Karen Williams, and to your Government Technical Representative (GTR) illustrating the change in the budget (i.e., showing where grant funds were moved from one budget category item to another). If the cumulative budget modifications to date do not exceed ten percent, a grant amendment is not required.

Please note that submission of the final report will be due at the currently negotiated end-date of the grant.

If you have any questions pertaining to this policy, please contact your GTR.

Sincerely,

A handwritten signature in black ink, appearing to read "Ellis G. Goldman", with a long horizontal line extending to the left.

Ellis G. Goldman
Director, Program Management Division

cc: Karen Williams